United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Partial Compliance Evaluation
SA Recycling LLC (PSC Metals)
3620 N. Hall Street
St. Louis, MO 63147
FRS# 110001452918

Inspection Date(s):
June 7, 2022

LUKE RODRIGUEZ
Digitally signed by LUKE RODRIGUEZ
Date: 2022.08.02 09:18:13 -05'00'

Luke Rodriguez, Inspector, ECAD, Air Branch

Authorized for Release by:

TRACEY CASBURN
Digitally signed by TRACEY CASBURN
Date: 2022.08.08 15:57:18 -05'00'

Tracey Casburn, Air Branch Chief, ECAD

11201 Renner Boulevard
Lenexa, Kansas 66219

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INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the multi-media partial compliance evaluation (PCE) inspection was to determine compliance of the facility with the Clean Air Act. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Compliance Initiative and the National Shredder Compliance Initiative.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	**Organization**	**Project Role**
Luke Rodriguez	EPA, Region 7, ECAD, Air Branch	Lead Inspector (Air)
Naji Ahmad	EPA, Region 7, ECAD, Water Branch	Lead Inspector (Stormwater)
Hani Hamzeh	MODNR, Air Branch	Field team member
Jena Adkisson	MODNR, Water Branch	Field team member
Sarah Wright	MODNR, Water Branch	Field team member

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	**Phone No.**	**Email Address**
Don Comer, Regional EHS Manager	314-300-5876	dcomer@sarecycling.com
Ray Dunmire, General Manager	314-300-5871	rdunmire@sarecycling.com

FACILITY OVERVIEW

Over the past 15 years, more than 25 emissions tests measuring volatile organic compounds (VOCs) have been conducted at scrap metal shredders. The historic test data shows that VOC emissions from shredding operations are at levels that can trigger regulatory applicability and the need for emission controls. The test data reveals that typical shredding operations emit VOCs at rates between 20 and 200 pounds (lbs) of VOCs per hour. Historically, State permitting agencies have not accounted for VOC emissions from shredders. Permit thresholds for VOC emissions vary depending on whether the shredder is in an area that meets the NAAQS for ozone or is in an ozone transport region. Major sources are subject to permitting requirements and facilities with VOC emissions above certain thresholds are required to undergo a New Source Review (NSR) or Prevention of Significant Deterioration (PSD) review for new and modified sources. Depending

on the location, existing facilities may be subject to Reasonably Available Control Technology (RACT) regulations at different emission thresholds. There are no federal regulations specifically

In June 2019, the Missouri Department of Natural Resources (MoDNR), issued the facility, then PSC Metals, a permit (permit NO. 062019-006) for the construction of a new shredder and installation was completed in August of 2019. The permit contains a 12-month rolling limit for polychlorinated biphenyls (PCB) emissions. The facility also has a 150-gallon gasoline tank which is subject to 40 CFR 63 Subpart CCCCCC and an 8,000-gallon diesel tank.

The facility was purchased by SA Recycling on December 8th, 2021.

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	**Standard Name**
40 CFR Part 63	Subpart A General Provisions
40 CFR Part 63	Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
MoDNR Permit	NO. 062019-006

FACILITY OPERATIONS SUMMARY

SA Recycling owns and operates a scrap metal recycling facility in St. Louis, Missouri. The scrap metal is delivered to the site by truck and rail car. Scrap metal is stockpiled, processed, shredded and sorted. The products are staged in storage piles of uniform size and material as they are generated from the various stages of the shredding, cutting, and shearing operations. Scrap metal comprised of aluminum, miscellaneous sheet steel, automobiles, and other metal parts, is put into a stockpile near the feed conveyor. Mr. Dunmire estimated that, on average, feed is typically 50% automotive and 50% 'white goods,' an industry term which includes appliances and generic small domestic steel containing products and materials. When automobiles arrive on site, they are processed at the car fluid stand (see Photo 12 in **Appendix A**) to remove all oil, fuel and refrigerant. Liquids are deposited in one of four tanks for later burning in the used oil heater in the machine shop (see Photo 1 in **Appendix A**). Refrigerant is captured and stored in canisters (see Photo 14 in **Appendix A**). After sorting and processing, scrap metal is shipped off site by truck and rail car.

The facility also conducts various maintenance activities on the trucks used for bringing scrap to the facility including painting as seen in Photos 1, 2, 3, 4, 5 and 15 in **Appendix A**.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on June 7, 2022, and completed a drive by surveillance inspection around 8:45 AM. The shredder was in operation at that time and there was a steam plume emanating from the shredder. I made entry at the front office at 9:00 AM and Mr. Ahmad introduced himself and members of the inspection team. Mr. Ahmad and I presented our credentials, and we provided business cards to Mr. Dunmire. Mr. Comer arrived a short time later and I conducted an opening conference during which I explained that the purpose of the visit was to conduct a multi-media inspection to determine compliance with the Clean Air Act and Clean Water Act. I explained that after asking for some general business information, I would observe emission units and review associated records demonstrating compliance with the permit conditions and regulations as well as evaluate the facilities VOC emissions and any possible applicable regulations for the facility. I explained to Mr. Dunmire and Mr. Comer that the facility could make a claim of business confidentiality and provided him with a Confidential Business Information form (**Appendix B**). Mr. Comer did not make a claim of confidentiality.

I was given a facility tour by Mr. Comer and Mr. Dunmire. I wore Steel toed boots, a hard hat and safety glasses during the facility tour per my site health and safety plan.

I conducted a closing conference with Mr. Comer and Mr. Dunmire. Mr. Ahmad provided the facility with a copy of the Small Business Resources information sheet. I provided Mr. Comer and Mr. Dunmire with a Receipt for Documents form (**Appendix C**).

INSPECTION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix A**. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description. Inspection was conducted and photographs in **Appendix A** taken in accordance with SOP 2312.01E.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

VOC Emissions

As noted above, facilities which operate shredders now have the obligation to determine their potential and actual VOC emissions and, depending on the results of those determinations, take any regulatorily required steps including the submission of permit applications as applicable. The shredder located at SA Recycling is permitted at a capacity of 112 tons per hour. Permit 062019-006 contains a rolling 12-month PCB emission limit for the shredder of 0.009 tons. The MoDNR calculated the potential emissions of the shredder at 0.03 tons of PCBs. There are no controls on the shredder which reduce PCB emissions and therefore the only means of meeting this emission limit is to limit the hours of operation of the shredder to 30% of its nominal throughput capacity. This limitation acts as a federally enforceable permit condition on the hours of operation for this unit and thus also limits the potential emissions for other pollutants emanating from this equipment. For this reason, it is unlikely that SA Recycling would be a Major Source with respect to VOC emissions. However, VOC emissions might be above the de minimis emission level located in the Missouri code of state regulations at10 CSR 10-6.020 (which is a federally approved regulation in the Missouri State Implementation Plan) and should be evaluated by the designated permitting authority.

PCB Emissions - Special Condition 1.A of Permit 062019-006

Special Condition 1.A of Permit 062019-006 limit SA Recycling to less than 0.009 tons of PCBs in any consecutive 12-month period. SA Recycling tracks compliance with this limitation by multiplying their monthly throughput by an emission factor in lbs/ton supplied by MoDNR. I reviewed all monthly and 12-month rolling PCB emission records from August 2019 when the shredder was constructed. These records did not indicate that SA Recycling had exceeded the emission rate of 0.009 tons in any of the consecutive 12-month periods.

Compliance with Special Conditions 2 and 3 of Permit 062019-006

Special Condition 2 of Permit 062019-006 requires SA Recycling to control dust from all haul roads using water or a surfactant spray and requires a specific application rate. Special Condition 3 specifies the recordkeeping required to demonstrate compliance with Special Condition 2. Mr. Comer told me that due to staffing issues, the facility had not watered the roads or maintained the daily log beginning in March of 2022 through the time of the inspection.

Other Equipment and Requirements

There is a 150-gallon gasoline tank at the facility subject to 40 CFR 63 Subpart CCCCCC. Mr. Dunmire said that the facility does not currently need to use the tank and planned to remove it from the site sometime in June 2022.

There is a CB-3500 waste oil furnace with a heating capacity of 0.35 MMBtu per hour and 2.3 gallons per hour located in the machine shop. This operation is specifically authorized under 40 CFR 279.23. I estimated emissions from the unit using AP42 Chapter 1.11 Waste Oil Combustion emission factors for space heaters. Emissions from this unit are likely below regulatory de minimis levels located in 10 CSR 10-6.020. There is no other stationary combustion equipment on-site.

The facility also paints in the maintenance shop. The spray enclosure can be seen in Photos 3 and 4 and the sprayer used can be seen in Photo 5 of **Appendix A**. The SDS for the paint used in this application is attached as **Appendix D**. This paint contains VOCs. The paint enclosure and operation should be evaluated with the designated permitting authority. The painting operation may also be subject to 40 CFR 63 Subpart HHHHHH. The state of Missouri is not delegated authority for 40 CFR 63 Subpart HHHHHH and therefore EPA is the delegated authority for implementing and enforcing this rule.

Refrigerant

The facility does not have any refrigerant containing units with greater than 5 lbs of refrigerant on-site.

Refrigerants used in automobiles typically include R12, R134a and R1234yf. Flammable contained gases are considered hazardous and the Resource Conservation and Recovery Act (RCRA) requires that flammable gases be identified as hazardous waste when disposed of. R12 and R134a are not flammable and may not be hazardous waste. R1234yf is described to be slightly flammable. A generator of waste that contains R1234yf needs to determine if it is a hazardous waste when it is generated and dispose of the material as a hazardous waste. The temporary storage containers seen in Photo 14 of **Appendix A** were unlabeled. Mr. Comer told me that the facility was attempting to find a place to dispose of the refrigerant.

Opacity

There were no visible emissions at the time of the inspection.

Potential Finding 1: Failure to apply water to haul roads
Observation Summary: Water application required by special condition not completed
Citation: Special Condition 2 of Permit 062019-006
Evidence: Mr. Comer informed me that the facility had not been able to apply water to the haul roads and had not been keeping the required records since March 2022.
Description of Observation: I requested to review the records of the haul road water application log and Mr. Comer informed me that the recordkeeping was incomplete and further that the facility did not have the staff available for a person to be responsible for applying water to the haul roads. Water had not been applied to the haul roads since the beginning of March 2022.

Potential Finding 2: Facility possibly Subject to 40 CFR 63 Subject HHHHHH
Observation Summary: Painting operation at the facility
Citation: 40 CFR 63 Subpart HHHHHH
Evidence: Photos 3, 4 and 5 in Appendix A.
Description of Observation: I observed a painting enclosure and a paint sprayer in the maintenance shop.

United States Environmental Protection Agency – Region 7

Digital Image Log

1. Facility Name: SA Recycling **2. FRS #: 110001452918**	**3. Inspector Name: Luke Rodriguez**		
4. Photographer (if Different):	**5. Date of Inspection: 6/7/22**		
6. Street Address of Digital Images: 3620 N. Hall Street	**7. City: St. Louis**	**8. State: MO**	**9. Zip: 63147**
10. Image Numbers: 1 - 15	**11. File Name: Appendix C**		

Weather: at 9AM

Temperature	Humidity	Wind Direction	Wind Speed	Sky Condition
72 F	82%	W	3 mph	Scattered

Digital Image Number	File Name	Description of Digital Image	Date and Time Digital Image Taken
1	DSCN2907	Used Oil Heater in Maintenance Shop	6/7/22 | 10:53 AM
2	DSCN2908	Used Oil Tank in Maintenance Shop	6/7/22 | 10:53 AM
3	DSCN2909	Painting Enclosure in Maintenance Shop	6/7/22 | 10:58 AM
4	DSCN2910	Painting Enclosure in Maintenance Shop	6/7/22 | 10:58 AM
5	DSCN2911	Paint Sprayer	6/7/22 | 10:59 AM
6	DSCN2912	Shredder from the West	6/7/22 | 11:00 AM
7	DSCN2913	Shredder from the West	6/7/22 | 11:06 AM
8	DSCN2914	Shredder from the East	6/7/22 | 11:08 AM
9	DSCN2915	Shredder Schematic	6/7/22 | 11:08 AM
10	DSCN2916	New Concentrator and Old Shredder	6/7/22 | 11:10 AM
11	DSCN2917	Car Pile	6/7/22 | 11:16 AM
12	DSCN2918	Car Fluid Stand	6/7/22 | 11:20 AM
13	DSCN2919	CFC Removal Equipment – Center Building	6/7/22 | 11:20 AM
14	DSCN2920	CFC Temporary Storage – Center Building	6/7/22 | 11:20 AM
15	DSCN2921	Paint for building renovation in Maintenance Shop	6/7/22 | 11:30 AM

Number	Photo
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2	

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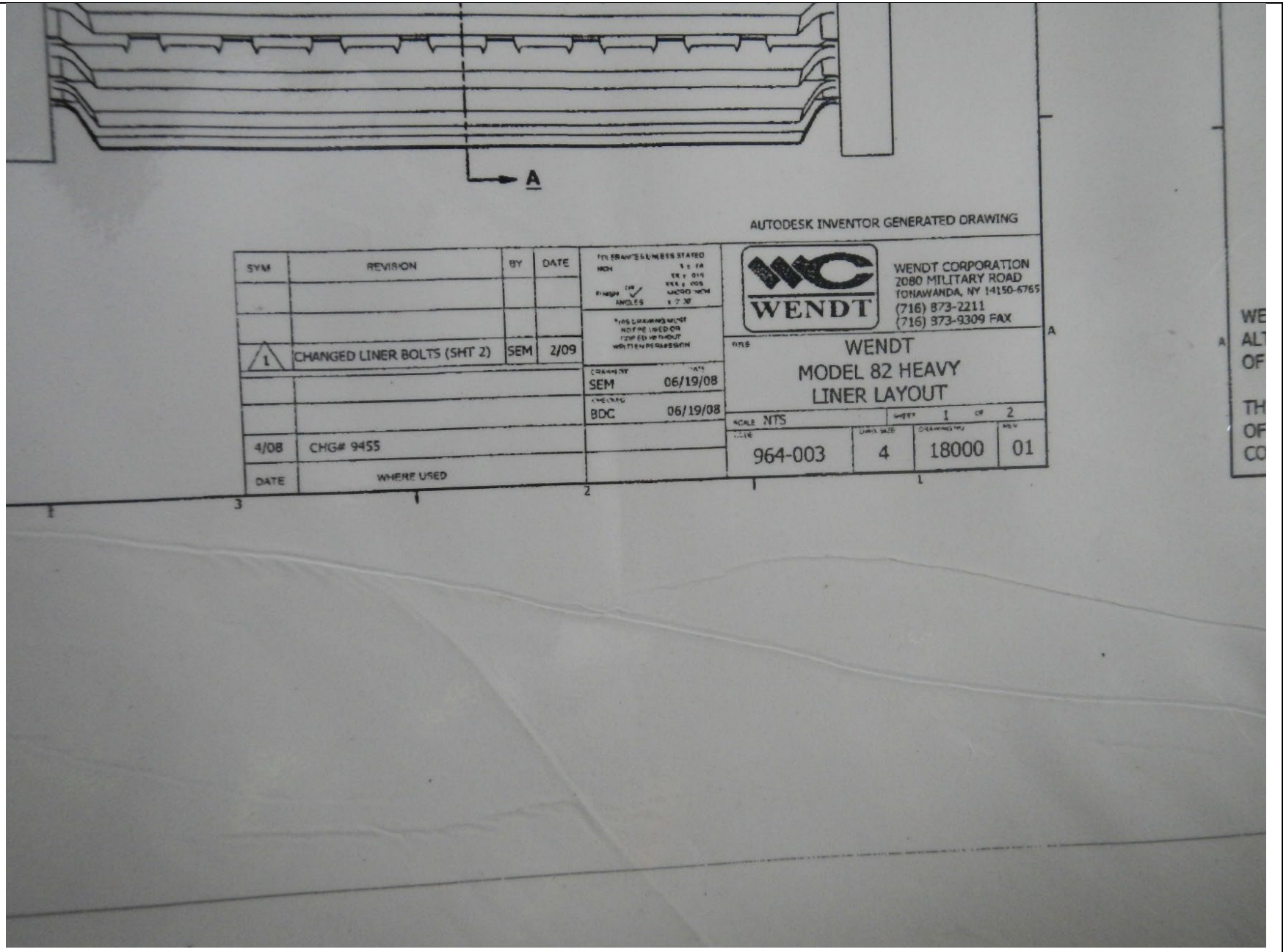
9	

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WENDT
WENDT CORPORATION
2080 MILITARY ROAD
TONAWANDA, NY 14150-6765
(716) 873-2211
(716) 873-9309 FAX
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11	

12	 CAUTION LOW HEADROOM CAUTION HAZARDOUS MATERIAL DANGER KEEP 150 FT. AWAY FROM FLAME OR SPARK DANGER

13	

14	

15